

# EXHIBIT D

**ECONOMIC LOSS**

1. Economic Loss Report prepared by Expert Economist Stan V. Smith, Ph.D.
2. Curriculum Vitae; Stan V. Smith, Ph.D.

**TAB 1**

## Corporate Financial Group, Ltd.

*Economics / Finance / Litigation Support*

*Stan V. Smith, Ph.D.  
President*

December 6, 2004

Mr. Paul J. Hedlund  
Baum & Hedlund  
12100 Wilshire Blvd. Ste. 950  
Los Angeles, CA 90025

Re: Corrigan

Dear Mr. Hedlund:

You have asked me to calculate the value of certain losses subsequent to the death of Georgine Corrigan. These losses are: (1) the loss of prospective earnings capacity and employee benefits; (2) the loss of household services; (3) the loss of the advice, counsel, guidance, instruction and training services sustained by Ms. Corrigan's daughter; (4) the loss of accompaniment services sustained by Ms. Corrigan's daughter; (5) the loss of child care services sustained by Ms. Corrigan's daughter; (6) the loss of the value of life ("LVL"), also known as loss of enjoyment of life; and (7) the loss of the society or relationship sustained by Ms. Corrigan's surviving family.

Georgine Corrigan was a 55.4-year-old, Caucasian, single female, who was born on April 24, 1946, and died on September 11, 2001. Ms. Corrigan's remaining life expectancy is estimated at 27.4 years. This data is from the National Center for Health Statistics, United States Life Tables, 2001, Vol. 52, No. 14, National Vital Statistics Reports, 2004. I assume an estimated trial or settlement date of June 1, 2005.

In order to perform this evaluation, I have reviewed the following materials: (1) a verification request from National Student Clearinghouse DegreeVerify; (2) an interview with Laura Brough on December 3, 2004; and (3) the case information form.

My methodology for estimating the losses, which is explained below, is generally based on past wage growth, interest rates, and consumer prices, as well as studies regarding the value of life.

My estimate of the real wage growth rate is 1.25 percent per year. This growth rate is based on Business Sector, Hourly Compensation growth data from the Major Sector Productivity and Costs Index found at the U.S. Bureau of Labor Statistics website

# CFG

at [www.bls.gov/data/home.htm](http://www.bls.gov/data/home.htm), Series ID: PRS84006103, for the real increase in wages primarily for the last 20 years.

My estimate of the tax-affected real discount rate is 1.06 percent per year. This discount rate is based on the rate of return on 90 day U.S. Treasury Bills published in the Economic Report of the President for the real return on T-Bills primarily for the last 20 years. This rate is also consistent with historical rates published by Ibbotson Associates, Chicago, in its continuously updated series Stocks, Bonds, Bills and Inflation. This series, which acknowledges me as its founder and creator, is generally regarded by academics in the field of finance as the most widely accepted source of statistics on the rates of return on investment securities. It is relied upon almost exclusively by academic and business economists, insurance companies, banks, institutional investors, CPA's, actuaries, benefit analysts, and economists in courts of law.

Estimates of real growth and discount rates are net of inflation based on the Consumer Price Index (CPI-W), published in monthly issues of the U.S. Bureau of Labor Statistics, CPI Detailed Report (Washington, D.C.: U.S. Government Printing Office) and available at the U.S. Bureau of Labor Statistics website at [www.bls.gov/data/home.htm](http://www.bls.gov/data/home.htm), Series ID: CWUR0000SA0. The rate of inflation for the past 20 years has been 2.92 percent.

I assume a tax rate of 21 percent. This rate applies to wage and interest earnings.

## I(A). LOSS OF PROSPECTIVE EARNINGS CAPACITY

Tables 1 through 7 show the loss of wages and benefits. Ms. Corrigan attended Bowling Green State University, however, she did not complete a degree. The wage estimate is based on the average earnings of a non-Hispanic, white female with a some college but no degree between the ages of 55 to 59 of \$37,498 in year 2003 dollars. This wage data is published in the U.S. Bureau of the Census and the Bureau of Labor Statistics, Current Population Survey, Annual Social and Economic Supplement, Washington, D.C., 2004.

Employee benefit estimates are based on data from the U.S. Chamber of Commerce, 2003 Employee Benefits Study, (Washington, DC: Statistics and Research Center, 2003). I have assumed that employee benefits grow at the same rate as wages and are discounted to present value at the same discount rate. Since these tables assume full-time work, I do not include employee benefits relating to unemployment, injury, illness or disability; benefits are estimated at 27.6 percent of wages.

# CFG

Personal consumption is an offset of the income. I use a personal consumption offset based on a study by Patton, Nelson, and Lierman, "Patton-Nelson Personal Consumption Tables Updated," Journal of Forensic Economics, Vol. 11, No. 1, Winter, 1998 which shows personal consumption to be 67.8 percent for a single person with income between \$35,000 and \$40,000.

I assume full-time employment each year and show the accumulation through life expectancy. While these tables are calculated through the end of life expectancy, the losses from working full-time through any assumed retirement age can be read off the table.

Based on the above assumptions, my opinion of the loss of prospective earnings capacity for full-time employment is \$361,031 ▶ Table 9. This figure assumes full-time work to age 82.8, but any assumed retirement age may be read from Table 9. For example, the full-time employment loss of prospective earnings capacity to age 67 is \$158,233.

## II. LOSS OF REPLACEMENT SERVICES

The following sections estimate the value of replacement services provided to Georgine Corrigan's daughter. These services do not include loss of love, care, or affection, etc., but are the tangible services, valued as if they were provided by a person unknown to the household.

### II(A). LOSS OF HOUSEHOLD SERVICES

Tables 10 through 12 show the loss of household services. Ms. Corrigan was living with her daughter, son-in-law and grandchildren at the time of her death. Laura Brough, Ms. Corrigan's daughter, states that her mother helped with the cooking, cleaning, grocery shopping and laundry as well as assisting with transportation for the grandsons. The number of hours of household services is illustrated at 2.0 hours per day, based on Ms. Corrigan's estimate of her mother's contribution. Household services are valued at \$6.68 per hour in year 1991 dollars, based on a study by Douglass, Kenney and Miller, "Which Estimates of Household Production are the Best?" Journal of Forensic Economics, Vol 4, No. 1, Winter 1990, pp 25-45, and unpublished updates from the authors. I value such services at their replacement cost which includes a minimum 50 percent hourly premium paid to agencies who supply such services on a part-time basis and who are responsible for insuring, bonding and vetting the part-time employee. The hourly value of these services grows at the same rate as wages and is discounted at the same rates as wages.

## CFG

Based on these assumptions, and Ms. Corrigan's life expectancy of 82.8 years, my opinion of the loss of the value of household services is \$331,758 ► Table 12.

### II(B). LOSS OF ADVICE, COUNSEL, GUIDANCE, INSTRUCTION AND TRAINING SERVICES

Tables 13 through 15 show the pecuniary loss of advice, counsel, guidance, instruction and training services sustained by Ms. Corrigan's daughter. The method of valuing the economic loss of these services is recognized in the economic literature. See, for example, Frank D. Tinari, "Household Services: Toward a More Comprehensive Measure," Journal of Forensic Economics, Vol. 11, No. 3, Fall 1998, p. 253-265. The hourly value of the loss is based on the mean hourly earnings of educational, vocational, and school counselors, marriage and family therapists, child, family and school social workers, social and human service assistants, clergy, directors of religious activities and education, coaches and elementary school teachers, which is \$17.54 per hour in year 2002 dollars. These wage data are based on information from the U.S. Bureau of Labor Statistics, Occupational Employment Statistics, 2002 National Occupational Employment and Wage Statistics found at [www.bls.gov/oes](http://www.bls.gov/oes). I value such services at their replacement cost which includes a minimum 50 percent hourly overhead premium paid to agencies who supply such services on a part-time basis and who are responsible for insuring, bonding and vetting the background, experience and training of the part-time employee.

Laura Brough states that her mother was her best friend, and she talked to her mother about everything. Her mother was a good role model and had good morals and standards. Her mother was always supportive of her decisions, however, her mother would also speak her mind if she believed that her decisions were going to hurt someone.

Based on a benchmark loss of 0.5 hours per day for Ms. Corrigan's daughter, my opinion of the loss of advice, counsel, guidance, instruction and training as a result of the death of Georgine Corrigan is \$147,087 ► Table 15 for Laura Brough.

### II(C). LOSS OF ACCOMPANIMENT SERVICES

Tables 16 through 18 show the pecuniary loss of accompaniment services sustained by Ms. Corrigan's daughter. The method of valuing the economic loss of these services is recognized in the economic literature. See, for example, Frank D. Tinari, "Household Services: Toward a More Comprehensive Measure," Journal of Forensic Economics, Vol. 11, No. 3, Fall 1998, p. 253-265. The hourly value of the loss of accompaniment is based on

# CFG

the mean hourly earnings of licensed practical and licensed vocational nurses and home health aides, which is \$12.35 per hour in year 2002 dollars. This wage data is based on information from the U.S. Bureau of Labor Statistics, Occupational Employment Statistics, 2002 National Occupational Employment and Wage Statistics found at [www.bls.gov/oes](http://www.bls.gov/oes). I value such services at their replacement cost which includes a minimum 50 percent hourly premium paid to agencies who supply such services on a part-time basis and who are responsible for insuring, bonding and vetting the part-time employee.

Laura Brough states that she and her mother did everything together. They enjoyed traveling, and they went to Mexico and California. They would occasionally take 2 hour lunches together and go to high tea. Mrs. Brough states that would do crafts with her mother, however, she was not very good and only did it so that she could spend time with her mother. They would go shopping, cook dinner and eat together. Her mother was always very active and hands-on in her life.

Based on a benchmark loss of 2.0 hours per day for Ms. Corrigan's daughter, my opinion of the loss of accompaniment as a result of the death of Georgine Corrigan is \$414,137 ▶ Table 18 for Laura Brough.

## II(D). LOSS OF CHILD CARE SERVICES

Tables 19 through 21 show the pecuniary loss of child care services sustained by Ms. Corrigan's daughter. The method of valuing the hourly value of child care services is based on the mean hourly earnings of child care workers, which is \$8.32 per hour in year 2002 dollars. This wage data is based on information from the U.S. Bureau of Labor Statistics, Occupational Employment Statistics, 2002 National Occupational Employment and Wage Statistics found at [www.bls.gov/oes](http://www.bls.gov/oes). I value such services at their replacement cost which includes a minimum 50 percent hourly premium paid to agencies who supply such services on a part-time basis and who are responsible for insuring, bonding and vetting the part-time employee.

Laura Brough states that her mother would often babysit her children. She states that her mother would watch the children for entire weekends, and she and her husband would go on trips or just check in a nearby hotel for the weekend. Her mother would also babysit during the week so that she and her husband could go out with friends or have time by herself. She estimates that her mother would spend approximately 2.0 hours per day babysitting for her children.



# CFG

Based on a benchmark loss of 2.0 hours per day through 2008 and at 1.0 hour per day from 2009 through 2014, my opinion of the loss of child care services as a result of the death of Georgine Corrigan is \$101,982 ► Table 21.

## IV. LOSS OF VALUE OF LIFE

Tables 22 through 24 show the loss of the value of life. Economists have long agreed that life is valued at more than the lost earnings capacity. My estimate of the value of life is based on many economic studies on what we, as a contemporary society, are willing to pay to preserve the ability to lead a normal life. The studies examine incremental pay for risky occupations as well as a multitude of data regarding expenditure for life savings by individuals, industry, and state and federal agencies. Based on societal value and life expectancy of 82.8 years, my opinion of the loss of the value of life for Georgine Corrigan is \$3,369,994 ► Table 24.

My estimate of the value of life is consistent with estimates published in other studies that examine and review the broad spectrum of economic literature on the value of life. Among these is "The Plausible Range for the Value of Life," Journal of Forensic Economics, Vol. 3, No. 3, pp. 17-39(1990), by T. R. Miller. This study reviews 67 different estimates of the value of life published by economists in peer-reviewed academic journals. The results, in most instances, show the value of life to range from approximately \$1.6 million to \$2.9 million dollars in year 1988 after-tax dollars, with a mean of approximately \$2.2 million dollars.

The underlying studies fall into three general groups: (1) consumer behavior and purchases of safety devices; (2) wage risk premiums to workers; and (3) cost-benefit analyses of regulations. For example, one consumer safety study analyzes the costs of smoke detectors and the lifesaving reduction associated with them. One wage premium study examines the differential rates of pay for dangerous occupations with a risk of death on the job. Just as workers receive shift premiums for undesirable work hours, workers also receive a higher rate of pay to accept a increased risk of death on the job. A study of government regulation examines the lifesaving resulting from the installation of smoke stack scrubbers at high-sulphur, coal-burning power plants. As a hypothetical example of the methodology, assume that a safety device costs \$460 and results in lowering a person's risk of premature death by one chance in 5,000. The cost per life saved is obtained by dividing \$460 by the one in 5,000 probability, yielding \$2,300,000. Overall, based on the peer-reviewed economic literature, I estimate the

## CFG

central tendency of the range of the economic studies to be approximately \$3.6 million in year 2004 dollars.

### V. LOSS OF SOCIETY OR RELATIONSHIP

Tables 25 through 27 show the loss of society or relationship sustained by Ms. Corrigan's daughter. The value of the loss of society or relationship by family members with the deceased can be based on a measure of the value of preserving the ability to live a normal life. This is discussed in the article, "The Relevance of Willingness-To-Pay Estimates of the Value of a Statistical Life in Determining Wrongful Death Awards," Journal of Forensic Economics, Vol. 3, No. 3, pp. 75-89 (1990), by L. G. Chestnut and D. M. Violette.

Based on a benchmark loss of 25 percent for each family member, my opinion of the loss of relationship as a result of the death of Georgine Corrigan is \$1,555,394 ▶ Table 27 for Laura Brough.

-----

A trier-of-fact may weigh other factors to determine if these estimated losses for Georgine Corrigan should be adjusted because of special qualities or circumstances that economists do not as yet have a methodology for analysis.

In each set of tables, the estimated losses are calculated from September 11, 2001 through an assumed trial or settlement date of June 1, 2005, and from that date thereafter. The last table in each set accumulates the past and future estimated losses. These estimates are provided as an aid, tool and guide for the trier-of-fact.

All opinions expressed in this report are clearly labeled as such. They are rendered in accordance with generally accepted standards within the field of economics, and are expressed to a reasonable degree of economic certainty. Estimates, assumptions, illustrations and the use of benchmarks, which are not opinions (but which can be viewed as hypothetical in nature) are also clearly identified.

If there is additional information which I have not yet taken into account and which could alter my opinions, please let me know so that I may incorporate any such information into an update of the opinions expressed in this report.

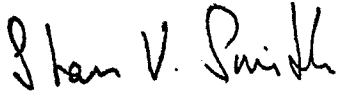
## CFG

---

If any additional information becomes available in the future which could alter my opinions, again, please let me know so that I may incorporate any such information into an update of the opinions expressed in this report.

If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink that reads "Stan V. Smith". The signature is written in a cursive, slightly slanted style.

Stan V. Smith, Ph.D.  
President

# CFG

## APPENDIX: HOUSEHOLD REPLACEMENT SERVICES

Courts have long recognized that members's claims to the value of family household replacement services as an element of damages in personal injury and wrongful death cases, as an aspect of the pecuniary loss in such cases. These services are those that are provided by the injured family member to other family members without charge or cost. Members who receive such services can include spouses, children, parents or siblings; such family members do not necessarily have to reside in the same household to receive such services.

Courts have long recognized that an appropriate method in valuing such services is to value their replacement costs by examining costs paid in labor markets that provide generally comparable services for. "[T]he service must have market equivalents from which a pecuniary standard can be established ..." This standard is set forth the 1913 U.S. Supreme Court Decision, Michigan Central Railroad Company v. Vreeland, 227 U.S. 59 (1913). So this method is a century old.

The Supreme Court's suggesting in valuing compensable services in the Vreeland decision is a standard that is not rigid, but actually rather general: "[The] pecuniary loss or damage must be one which can be measured by some standard.... Compensation for such loss manifestly does not include damages by way of recompense for grief or wounded feelings." Michigan Central v. Vreeland.

Examples of lost household services that used to be performed by victims (whether fatally or non-fatally injured) can include physical chores such as mowing the lawn, painting the house, cleaning the windows, doing the laundry, washing and repairing the car, preparing the meals and doing the dishes, among others. For many decades economists have met the Supreme Court's general standard by using labor market equivalents for cooks, laundry workers, gardeners, maids, etc. in valuing the physical chores regarding housekeeping services.

However, economists have recognized that services to family members include services well beyond the physical housekeeping chores. For example, William G. Jungbauer and Mark J. Odegard, in Maximizing Recovery in FELA Wrongful Death Actions, "in Assessing Family Loss in Wrongful Death Litigation: The Special Roles of Lost Services and Personal Consumption, Lawyers & Judges Publishing Co., 1999, p. 284, indicate that a complete analysis of all services performed by the injured or deceased person includes much, much more than the physical chores. Frank D. Tinari, in a peer-reviewed, scientific, economic journal article "Household Services: Toward a More Comprehensive Measure, " Journal of Forensic Economics, 11(3), 1998, expresses the same view.

## CFG

---

Jungbauer and Odegard indicate that a victim may have provided services of many other professions such as that of a chauffeur, driving other family members to appointments, or that of a security guard, especially regarding the injury to a male spouse, etc. Every family member acts as a companion to other family members. And it is common for family members to act as a counselors for one another, typically providing advice and counsel on important personal, family, medical, financial, career or other issues. The marketplace can and does value such items of loss. If the victim cannot provide these services, or does so at a reduced capacity or rate, there is a distinct and definite loss to the other family members. These losses have a definite and easily measurable pecuniary value. Vreeland requires only that a "reasonable expectation" of loss of services be proven and that such loss be valued by some standard, presumably a reasonably-based economic standard, to allow recovery.

Tinari discusses a market-oriented method to assess the pecuniary value of the loss of accompaniment services, as well as the value of advice, guidance and counsel services that family members provide to one another, within a broadly defined scope of family services. See Frank D. Tinari, "Household Services: Toward a More Comprehensive Measure, " Journal of Forensic Economics, 11(3), 1998.

Finally, according to Chief Justice Robert Wilentz of the Supreme Court of New Jersey, in Green v. Bittner, 85 NJ 1, 1980, p. 12, accompaniment services, to be compensable, must be that which would have provided services substantially equivalent to those provided by the companions often hired today by the aged or infirm, or substantially equivalent to services provided by nurses or practical nurses; and its value must be confined to what the marketplace would pay a stranger with similar qualifications for performing such services.

In valuing the household replacement services that are provided by family members to one another, beyond the physical chores, both the U.S Supreme Court and the New Jersey Supreme Court discuss looking at labor markets for the equivalent value of such services. This methodology is identical to what economists have been doing for over four decades in valuing the physical chores involved in housekeeping services.

# CFG

## APPENDIX: VALUE OF LIFE

The economic methodology for the valuation of life has been found to meet the standards set forth in Daubert v. Merrell Dow Pharmaceuticals, 113 S.Ct. 2786 (1993). My testimony has been accepted in over 100 jurisdictions nationwide in over half the states. Dozens of other economists have offered this testimony over the past decade also. The Daubert standard sets forth four criteria:

1. Testing of the theory and science
2. Peer Review
3. Known or potential rate of error
4. Generally accepted.

Testing of the theory and science has been accomplished over the past four decades, since the 1960s. Economists of high renown have published articles in high quality, peer-reviewed economic journals.

A review of this extensive literature can be found in "The Value of Risks to Life and Health," W. Kip Viscusi, Journal of Economic Literature, Vol. XXXI (December, 1993), pp. 1912-1946. Another peer-reviewed article discusses the application to forensic economics: "The Plausible Range for the Value of Life," T. R. Miller, Journal of Forensic Economics, Fall 1990, which discusses the many dozens of articles published in other peer-reviewed economic journals on this topic. This concept is further discussed in "Willingness to Pay Comes of Age: Will the System Survive?" Ted R. Miller, Northwestern University Law Review, Summer 1989, pp. 876-907, and "Hedonic Damages in Personal Injury and Wrongful Death Litigation," by me in Litigation Economics, pp. 39-59. Kenneth Arrow, a Nobel Laureate in economics discusses this method for valuing life in "Invaluable Goods," Journal of Economic Literature, XXXV, No. 2, 1997, p. 759. All of these articles discuss the known or potential rate of error, well within the acceptable standard in the field of economics, generally using a 95% confidence rate for the statistical testing and acceptance of results.

This methodology has been generally accepted in the field of economics. Indeed, according to the prestigious and highly-regarded think tank, The Rand Corporation, by 1988: "Most economists would agree that the willingness-to-pay is the most conceptually appropriate criterion for establishing the value of life," Computing Economic loss in Cases of Wrongful Death, King and Smith, Rand Institute for Civil Justice, R-3549-ICJ, 1988. While first discussed in cutting edge, peer-reviewed economic journals, this methodology is now taught in standard economics



## CFG

courses at the undergraduate and graduate level throughout hundreds of colleges and universities nationwide as it is discussed in widely-accepted textbooks in the field of law and economics: Economics, David C. Colander, Irwin, Chicago, 2004, pp. 446-449; this introductory to an economics textbook is the third most widely used textbook in college courses nationwide. Hamermesh and Rees's The Economics of Work and Pay, HarperCollins, 1993, Chapter 13, perhaps the standard advanced textbook in labor economics, also discusses the methodology for valuing life. Other textbooks discuss this topic. Richard Posner, Chief Justice of the U.S. Court of Appeals for the 7th Circuit and Senior Lecturer at the University of Chicago Law School, one of most prolific legal writers in America, details the Value of Life approach in his widely used textbooks: Economic Analysis of Law, 1986, Little Brown & Co., pp. 182-185 and Tort Law, 1982, Little Brown & Co., p 120-126.

Forensic Economics is now taught as a special field in a number of institutions nationwide. I taught what is believed to be the first course ever presented in the field of Forensic Economics at DePaul University in Spring, 1990. My own book, Economic/Hedonic Damages, Anderson, 1990, co-authored with Dr. Michael Brookshire, a Professor of Economics in West Virginia, has been used as a textbook in at least 5 colleges and universities nationwide in such courses in economics, and has a thorough discussion of the methodology. Toppino et. al., in "Forensic Economics in the Classroom," published in The Earnings Analyst, Journal of the American Rehabilitation Economics Association, pp. 53-86, Vol. IV, 2001, indicate that hedonic damages is one of 15 major topic areas taught in such courses.

Finally, this methodology is endorsed by the U. S. Government as the standard and recommended approach for use by all U. S. Agencies in valuing life for policy purposes, as mandated in current and past Presidential Executive Orders in effect since 1972, and as discussed in "Report to Congress on the Costs and Benefits of Federal Regulations," Office of Management and Budget, 1998, and "Economic Analysis of Federal Regulations Under Executive Order 12866," Executive Office of the President, Office of Management and Budget, pp. 1-37, and "Report to the President on Executive Order No. 12866, Regulatory Planning and Review, May 1, 1994, Office of Information and Regulatory Affairs, Office of Management and Budget. Prior presidents signed similar orders as discussed in "Federal Agency Valuations of Human life", Administrative Conference of the United States, Report for Recommendation 88-7, December 1988, pp. 368-408.

# CFG

## SUMMARY OF LOSSES FOR GEORGINE CORRIGAN

TABLE *****	DESCRIPTION *****	ESTIMATE *****
	<u>EARNINGS</u>	
	LOSS OF WAGES & BENEFITS, NET OF PERSONAL CONSUMPTION	
9	Full-Time Employment to age 67	\$ 158,233
	-----	
	<u>REPLACEMENT SERVICES</u>	
12	LOSS OF HOUSEHOLD SERVICES	\$ 331,758
	LOSS OF GUIDANCE	
15	Laura Brough	\$ 147,087
	LOSS OF ACCOMPANIMENT	
18	Laura Brough	\$ 414,137
21	LOSS OF CHILD CARE SERVICES	\$ 101,982
	-----	
	<u>LOSS OF ENJOYMENT OF LIFE</u>	
24	LOSS OF VALUE OF LIFE	\$3,369,994
	-----	
	<u>LOSS OF RELATIONSHIP</u>	
27	LOSS OF RELATIONSHIP Laura Brough	\$1,555,394

The information on this Summary of Losses is intended to summarize losses under certain given assumptions. Please refer to the report and the tables for all the opinions.



Table 1

LOSS OF PAST WAGES  
2001 - 2005

YEAR	AGE	WAGES	CUMULATE
****	***	*****	*****
2001	55	\$8,595	\$8,595
2002	56	28,683	37,278
2003	57	29,623	66,901
2004	58	30,734	97,635
2005	59	13,192	\$110,827
CORRIGAN		\$110,827	

Table 2

LOSS OF PAST EMPLOYEE BENEFITS  
2001 - 2005

YEAR	AGE	EMPLOYEE BENEFITS	CUMULATE
****	***	*****	*****
2001	55	\$2,372	\$2,372
2002	56	7,917	10,289
2003	57	8,176	18,465
2004	58	8,483	26,948
2005	59	3,641	\$30,589
CORRIGAN		\$30,589	

Table 3

LOSS OF PAST PERSONAL CONSUMPTION  
2001 - 2005

YEAR	AGE	PERSONAL CONSUMPTION	CUMULATE
****	***	*****	*****
2001	55	-\$7,436	-\$7,436
2002	56	-24,814	-32,250
2003	57	-25,627	-57,877
2004	58	-26,588	-84,465
2005	59	-11,412	-\$95,877
CORRIGAN		-\$95,877	

Table 4

ECONOMIC LOSS TO DATE  
2001 - 2005

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	PERSONAL CONSUMPTION	TOTAL	CUMULATE
****	***	*****	*****	*****	*****	*****
2001	55	\$8,595	\$2,372	-\$7,436	\$3,531	\$3,531
2002	56	28,683	7,917	-24,814	11,786	15,317
2003	57	29,623	8,176	-25,627	12,172	27,489
2004	58	30,734	8,483	-26,588	12,629	40,118
2005	59	13,192	3,641	-11,412	5,421	\$45,539
CORRIGAN		\$110,827	\$30,589	-\$95,877	\$45,539	

Table 5

PRESENT VALUE OF FUTURE WAGES  
2005 - 2029

YEAR	AGE	WAGES	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2005	59	\$18,695	0.99382	\$18,580	\$18,580
2006	60	32,286	0.98340	31,750	50,330
2007	61	32,690	0.97308	31,810	82,140
2008	62	33,099	0.96288	31,870	114,010
2009	63	33,513	0.95278	31,931	145,941
2010	64	33,932	0.94279	31,991	177,932
2011	65	34,356	0.93290	32,051	209,983
2012	66	34,785	0.92311	32,110	242,093
2013	67	35,220	0.91343	32,171	274,264
2014	68	35,660	0.90385	32,231	306,495
2015	69	36,106	0.89437	32,292	338,787
2016	70	36,557	0.88499	32,353	371,140
2017	71	37,014	0.87570	32,413	403,553
2018	72	37,477	0.86652	32,475	436,028
2019	73	37,945	0.85743	32,535	468,563
2020	74	38,419	0.84844	32,596	501,159
2021	75	38,899	0.83954	32,657	533,816
2022	76	39,385	0.83073	32,718	566,534
2023	77	39,877	0.82202	32,780	599,314
2024	78	40,375	0.81340	32,841	632,155
2025	79	40,880	0.80487	32,903	665,058
2026	80	41,391	0.79642	32,965	698,023
2027	81	41,908	0.78807	33,026	731,049
2028	82	42,432	0.77980	33,088	764,137
2029	83	4,708	0.77890	3,667	\$767,804

GEORGINE CORRIGAN

\$767,804

Table 6

PRESENT VALUE OF FUTURE EMPLOYEE BENEFITS  
2005 - 2029

YEAR	AGE	EMPLOYEE BENEFITS	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2005	59	\$5,160	0.99382	\$5,128	\$5,128
2006	60	8,911	0.98340	8,763	13,891
2007	61	9,022	0.97308	8,779	22,670
2008	62	9,135	0.96288	8,796	31,466
2009	63	9,250	0.95278	8,813	40,279
2010	64	9,365	0.94279	8,829	49,108
2011	65	9,482	0.93290	8,846	57,954
2012	66	9,601	0.92311	8,863	66,817
2013	67	9,721	0.91343	8,879	75,696
2014	68	9,842	0.90385	8,896	84,592
2015	69	9,965	0.89437	8,912	93,504
2016	70	10,090	0.88499	8,930	102,434
2017	71	10,216	0.87570	8,946	111,380
2018	72	10,344	0.86652	8,963	120,343
2019	73	10,473	0.85743	8,980	129,323
2020	74	10,604	0.84844	8,997	138,320
2021	75	10,736	0.83954	9,013	147,333
2022	76	10,870	0.83073	9,030	156,363
2023	77	11,006	0.82202	9,047	165,410
2024	78	11,144	0.81340	9,065	174,475
2025	79	11,283	0.80487	9,081	183,556
2026	80	11,424	0.79642	9,098	192,654
2027	81	11,567	0.78807	9,116	201,770
2028	82	11,711	0.77980	9,132	210,902
2029	83	1,299	0.77890	1,012	\$211,914
GEORGINE CORRIGAN				\$211,914	

Table 7

PRESENT VALUE OF FUTURE PERSONAL CONSUMPTION  
2005 - 2029

YEAR	AGE	PERSONAL CONSUMPTION	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2005	59	-\$16,173	0.99382	-\$16,073	-\$16,073
2006	60	-27,931	0.98340	-27,467	-43,540
2007	61	-28,280	0.97308	-27,519	-71,059
2008	62	-28,634	0.96288	-27,571	-98,630
2009	63	-28,992	0.95278	-27,623	-126,253
2010	64	-29,355	0.94279	-27,676	-153,929
2011	65	-29,721	0.93290	-27,727	-181,656
2012	66	-30,093	0.92311	-27,779	-209,435
2013	67	-30,469	0.91343	-27,831	-237,266
2014	68	-30,849	0.90385	-27,883	-265,149
2015	69	-31,235	0.89437	-27,936	-293,085
2016	70	-31,625	0.88499	-27,988	-321,073
2017	71	-32,021	0.87570	-28,041	-349,114
2018	72	-32,421	0.86652	-28,093	-377,207
2019	73	-32,826	0.85743	-28,146	-405,353
2020	74	-33,236	0.84844	-28,199	-433,552
2021	75	-33,652	0.83954	-28,252	-461,804
2022	76	-34,072	0.83073	-28,305	-490,109
2023	77	-34,498	0.82202	-28,358	-518,467
2024	78	-34,928	0.81340	-28,410	-546,877
2025	79	-35,365	0.80487	-28,464	-575,341
2026	80	-35,807	0.79642	-28,517	-603,858
2027	81	-36,255	0.78807	-28,571	-632,429
2028	82	-36,708	0.77980	-28,625	-661,054
2029	83	-4,073	0.77890	-3,172	-\$664,226
GEORGINE CORRIGAN				-\$664,226	

Table 8

PRESENT VALUE OF FUTURE WAGES AND BENEFITS  
2005 - 2029

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	PERSONAL CONSUMPTION	TOTAL	CUMULATE
****	***	*****	*****	*****	*****	*****
2005	59	\$18,580	\$5,128	-\$16,073	\$7,635	\$7,635
2006	60	31,750	8,763	-27,467	13,046	20,681
2007	61	31,810	8,779	-27,519	13,070	33,751
2008	62	31,870	8,796	-27,571	13,095	46,846
2009	63	31,931	8,813	-27,623	13,121	59,967
2010	64	31,991	8,829	-27,676	13,144	73,111
2011	65	32,051	8,846	-27,727	13,170	86,281
2012	66	32,110	8,863	-27,779	13,194	99,475
2013	67	32,171	8,879	-27,831	13,219	112,694
2014	68	32,231	8,896	-27,883	13,244	125,938
2015	69	32,292	8,912	-27,936	13,268	139,206
2016	70	32,353	8,930	-27,988	13,295	152,501
2017	71	32,413	8,946	-28,041	13,318	165,819
2018	72	32,475	8,963	-28,093	13,345	179,164
2019	73	32,535	8,980	-28,146	13,369	192,533
2020	74	32,596	8,997	-28,199	13,394	205,927
2021	75	32,657	9,013	-28,252	13,418	219,345
2022	76	32,718	9,030	-28,305	13,443	232,788
2023	77	32,780	9,047	-28,358	13,469	246,257
2024	78	32,841	9,065	-28,410	13,496	259,753
2025	79	32,903	9,081	-28,464	13,520	273,273
2026	80	32,965	9,098	-28,517	13,546	286,819
2027	81	33,026	9,116	-28,571	13,571	300,390
2028	82	33,088	9,132	-28,625	13,595	313,985
2029	83	3,667	1,012	-3,172	1,507	\$315,492
CORRIGAN		\$767,804	\$211,914	-\$664,226	\$315,492	



Table 9

PRESENT VALUE OF NET WAGE AND BENEFIT LOSS  
2001 - 2029

YEAR	AGE	WAGES	EMPLOYEE BENEFITS	PERSONAL CONSUMPTION	TOTAL	CUMULATE
****	***	*****	*****	*****	*****	*****
2001	55	\$8,595	\$2,372	-\$7,436	\$3,531	\$3,531
2002	56	28,683	7,917	-24,814	11,786	15,317
2003	57	29,623	8,176	-25,627	12,172	27,489
2004	58	30,734	8,483	-26,588	12,629	40,118
2005	59	31,772	8,769	-27,485	13,056	53,174
2006	60	31,750	8,763	-27,467	13,046	66,220
2007	61	31,810	8,779	-27,519	13,070	79,290
2008	62	31,870	8,796	-27,571	13,095	92,385
2009	63	31,931	8,813	-27,623	13,121	105,506
2010	64	31,991	8,829	-27,676	13,144	118,650
2011	65	32,051	8,846	-27,727	13,170	131,820
2012	66	32,110	8,863	-27,779	13,194	145,014
2013	67	32,171	8,879	-27,831	13,219	158,233
2014	68	32,231	8,896	-27,883	13,244	171,477
2015	69	32,292	8,912	-27,936	13,268	184,745
2016	70	32,353	8,930	-27,988	13,295	198,040
2017	71	32,413	8,946	-28,041	13,318	211,358
2018	72	32,475	8,963	-28,093	13,345	224,703
2019	73	32,535	8,980	-28,146	13,369	238,072
2020	74	32,596	8,997	-28,199	13,394	251,466
2021	75	32,657	9,013	-28,252	13,418	264,884
2022	76	32,718	9,030	-28,305	13,443	278,327
2023	77	32,780	9,047	-28,358	13,469	291,796
2024	78	32,841	9,065	-28,410	13,496	305,292
2025	79	32,903	9,081	-28,464	13,520	318,812
2026	80	32,965	9,098	-28,517	13,546	332,358
2027	81	33,026	9,116	-28,571	13,571	345,929
2028	82	33,088	9,132	-28,625	13,595	359,524
2029	83	3,667	1,012	-3,172	1,507	\$361,031
CORRIGAN		\$878,631	\$242,503	-\$760,103	\$361,031	

LOSS OF PAST HOUSEHOLD SERVICES  
2001 - 2005

YEAR	AGE	HOUSEHOLD SERVICES	CUMULATE
****	***	*****	*****
2001	55	\$3,246	\$3,246
2002	56	10,831	14,077
2003	57	11,187	25,264
2004	58	11,606	36,870
2005	59	4,981	\$41,851
CORRIGAN		\$41,851	

Table 11

PRESENT VALUE OF FUTURE HOUSEHOLD SERVICES  
2005 - 2029

YEAR	AGE	HOUSEHOLD SERVICES	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2005	59	\$7,060	0.99382	\$7,016	\$7,016
2006	60	12,192	0.98340	11,990	19,006
2007	61	12,344	0.97308	12,012	31,018
2008	62	12,498	0.96288	12,034	43,052
2009	63	12,654	0.95278	12,056	55,108
2010	64	12,812	0.94279	12,079	67,187
2011	65	12,972	0.93290	12,102	79,289
2012	66	13,134	0.92311	12,124	91,413
2013	67	13,298	0.91343	12,147	103,560
2014	68	13,464	0.90385	12,169	115,729
2015	69	13,632	0.89437	12,192	127,921
2016	70	13,802	0.88499	12,215	140,136
2017	71	13,975	0.87570	12,238	152,374
2018	72	14,150	0.86652	12,261	164,635
2019	73	14,327	0.85743	12,284	176,919
2020	74	14,506	0.84844	12,307	189,226
2021	75	14,687	0.83954	12,330	201,556
2022	76	14,871	0.83073	12,354	213,910
2023	77	15,057	0.82202	12,377	226,287
2024	78	15,245	0.81340	12,400	238,687
2025	79	15,436	0.80487	12,424	251,111
2026	80	15,629	0.79642	12,447	263,558
2027	81	15,824	0.78807	12,470	276,028
2028	82	16,022	0.77980	12,494	288,522
2029	83	1,778	0.77890	1,385	\$289,907

GEORGINE CORRIGAN

\$289,907

PRESENT VALUE OF NET HOUSEHOLD SERVICES  
2001 - 2029

YEAR	AGE	HOUSEHOLD SERVICES	CUMULATE
****	***	*****	*****
2001	55	\$3,246	\$3,246
2002	56	10,831	14,077
2003	57	11,187	25,264
2004	58	11,606	36,870
2005	59	11,997	48,867
2006	60	11,990	60,857
2007	61	12,012	72,869
2008	62	12,034	84,903
2009	63	12,056	96,959
2010	64	12,079	109,038
2011	65	12,102	121,140
2012	66	12,124	133,264
2013	67	12,147	145,411
2014	68	12,169	157,580
2015	69	12,192	169,772
2016	70	12,215	181,987
2017	71	12,238	194,225
2018	72	12,261	206,486
2019	73	12,284	218,770
2020	74	12,307	231,077
2021	75	12,330	243,407
2022	76	12,354	255,761
2023	77	12,377	268,138
2024	78	12,400	280,538
2025	79	12,424	292,962
2026	80	12,447	305,409
2027	81	12,470	317,879
2028	82	12,494	330,373
2029	83	1,385	\$331,758
CORRIGAN		\$331,758	

LOSS OF PAST GUIDANCE TO LAURA  
2001 - 2005

YEAR	AGE	GUIDANCE	CUMULATE
****	***	*****	*****
2001	31	\$1,439	\$1,439
2002	32	4,802	6,241
2003	33	4,959	11,200
2004	34	5,145	16,345
2005	35	2,208	\$18,553
BROUGH		\$18,553	

Table 14

PRESENT VALUE OF FUTURE GUIDANCE TO LAURA  
2005 - 2029

YEAR	AGE	GUIDANCE	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2005	35	\$3,130	0.99382	\$3,110	\$3,110
2006	36	5,405	0.98340	5,315	8,425
2007	37	5,473	0.97308	5,326	13,751
2008	38	5,541	0.96288	5,335	19,086
2009	39	5,610	0.95278	5,345	24,431
2010	40	5,680	0.94279	5,355	29,786
2011	41	5,751	0.93290	5,365	35,151
2012	42	5,823	0.92311	5,375	40,526
2013	43	5,896	0.91343	5,386	45,912
2014	44	5,970	0.90385	5,396	51,308
2015	45	6,045	0.89437	5,406	56,714
2016	46	6,121	0.88499	5,417	62,131
2017	47	6,198	0.87570	5,428	67,559
2018	48	6,275	0.86652	5,437	72,996
2019	49	6,353	0.85743	5,447	78,443
2020	50	6,432	0.84844	5,457	83,900
2021	51	6,512	0.83954	5,467	89,367
2022	52	6,593	0.83073	5,477	94,844
2023	53	6,675	0.82202	5,487	100,331
2024	54	6,758	0.81340	5,497	105,828
2025	55	6,842	0.80487	5,507	111,335
2026	56	6,928	0.79642	5,518	116,853
2027	57	7,015	0.78807	5,528	122,381
2028	58	7,103	0.77980	5,539	127,920
2029	59	788	0.77890	614	\$128,534
LAURA BROUGH				\$128,534	

Table 15

PRESENT VALUE OF NET GUIDANCE TO LAURA  
2001 - 2029

YEAR	AGE	GUIDANCE	CUMULATE
****	***	*****	*****
2001	31	\$1,439	\$1,439
2002	32	4,802	6,241
2003	33	4,959	11,200
2004	34	5,145	16,345
2005	35	5,318	21,663
2006	36	5,315	26,978
2007	37	5,326	32,304
2008	38	5,335	37,639
2009	39	5,345	42,984
2010	40	5,355	48,339
2011	41	5,365	53,704
2012	42	5,375	59,079
2013	43	5,386	64,465
2014	44	5,396	69,861
2015	45	5,406	75,267
2016	46	5,417	80,684
2017	47	5,428	86,112
2018	48	5,437	91,549
2019	49	5,447	96,996
2020	50	5,457	102,453
2021	51	5,467	107,920
2022	52	5,477	113,397
2023	53	5,487	118,884
2024	54	5,497	124,381
2025	55	5,507	129,888
2026	56	5,518	135,406
2027	57	5,528	140,934
2028	58	5,539	146,473
2029	59	614	\$147,087
BROUGH		\$147,087	

LOSS OF PAST ACCOMPANIMENT TO LAURA  
2001 - 2005

YEAR	AGE	ACCOMPANIMENT	CUMULATE
****	***	*****	*****
2001	31	\$4,051	\$4,051
2002	32	13,520	17,571
2003	33	13,963	31,534
2004	34	14,487	46,021
2005	35	6,218	\$52,239
BROUGH		\$52,239	



PRESENT VALUE OF FUTURE ACCOMPANIMENT TO LAURA  
2005 - 2029

YEAR	AGE	ACCOMPANIMENT	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2005	35	\$8,812	0.99382	\$8,758	\$8,758
2006	36	15,218	0.98340	14,965	23,723
2007	37	15,408	0.97308	14,993	38,716
2008	38	15,601	0.96288	15,022	53,738
2009	39	15,796	0.95278	15,050	68,788
2010	40	15,993	0.94279	15,078	83,866
2011	41	16,193	0.93290	15,106	98,972
2012	42	16,395	0.92311	15,134	114,106
2013	43	16,600	0.91343	15,163	129,269
2014	44	16,808	0.90385	15,192	144,461
2015	45	17,018	0.89437	15,220	159,681
2016	46	17,231	0.88499	15,249	174,930
2017	47	17,446	0.87570	15,277	190,207
2018	48	17,664	0.86652	15,306	205,513
2019	49	17,885	0.85743	15,335	220,848
2020	50	18,109	0.84844	15,364	236,212
2021	51	18,335	0.83954	15,393	251,605
2022	52	18,564	0.83073	15,422	267,027
2023	53	18,796	0.82202	15,451	282,478
2024	54	19,031	0.81340	15,480	297,958
2025	55	19,269	0.80487	15,509	313,467
2026	56	19,510	0.79642	15,538	329,005
2027	57	19,754	0.78807	15,568	344,573
2028	58	20,001	0.77980	15,597	360,170
2029	59	2,219	0.77890	1,728	\$361,898
LAURA BROUGH				\$361,898	

Table 18

PRESENT VALUE OF NET ACCOMPANIMENT TO LAURA  
2001 - 2029

YEAR	AGE	ACCOMPANIMENT	CUMULATE
****	***	*****	*****
2001	31	\$4,051	\$4,051
2002	32	13,520	17,571
2003	33	13,963	31,534
2004	34	14,487	46,021
2005	35	14,976	60,997
2006	36	14,965	75,962
2007	37	14,993	90,955
2008	38	15,022	105,977
2009	39	15,050	121,027
2010	40	15,078	136,105
2011	41	15,106	151,211
2012	42	15,134	166,345
2013	43	15,163	181,508
2014	44	15,192	196,700
2015	45	15,220	211,920
2016	46	15,249	227,169
2017	47	15,277	242,446
2018	48	15,306	257,752
2019	49	15,335	273,087
2020	50	15,364	288,451
2021	51	15,393	303,844
2022	52	15,422	319,266
2023	53	15,451	334,717
2024	54	15,480	350,197
2025	55	15,509	365,706
2026	56	15,538	381,244
2027	57	15,568	396,812
2028	58	15,597	412,409
2029	59	1,728	\$414,137
BROUGH		\$414,137	

LOSS OF PAST CHILD CARE SERVICES  
2001 - 2005

YEAR	AGE	CHILD CARE SERVICES	CUMULATE
****	***	*****	*****
2001	31	\$2,730	\$2,730
2002	32	9,110	11,840
2003	33	9,409	21,249
2004	34	9,762	31,011
2005	35	4,190	\$35,201
BROUGH		\$35,201	

PRESENT VALUE OF FUTURE CHILD CARE SERVICES  
2005 - 2014

YEAR	AGE	CHILD CARE SERVICES	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2005	35	\$5,938	0.99382	\$5,901	\$5,901
2006	36	10,255	0.98340	10,085	15,986
2007	37	10,383	0.97308	10,103	26,089
2008	38	10,513	0.96288	10,123	36,212
2009	39	5,322	0.95278	5,071	41,283
2010	40	5,389	0.94279	5,081	46,364
2011	41	5,456	0.93290	5,090	51,454
2012	42	5,524	0.92311	5,099	56,553
2013	43	5,593	0.91343	5,109	61,662
2014	44	5,663	0.90385	5,119	\$66,781
LAURA BROUGH				\$66,781	

Table 21

PRESENT VALUE OF NET CHILD CARE SERVICES  
2001 - 2014

YEAR	AGE	CHILD CARE SERVICES	CUMULATE
****	***	*****	*****
2001	31	\$2,730	\$2,730
2002	32	9,110	11,840
2003	33	9,409	21,249
2004	34	9,762	31,011
2005	35	10,091	41,102
2006	36	10,085	51,187
2007	37	10,103	61,290
2008	38	10,123	71,413
2009	39	5,071	76,484
2010	40	5,081	81,565
2011	41	5,090	86,655
2012	42	5,099	91,754
2013	43	5,109	96,863
2014	44	5,119	\$101,982
BROUGH		\$101,982	

Table 22

LOSS OF PAST LVL TO GEORGINE  
2001 - 2005

YEAR	AGE	LVL	CUMULATE
****	***	*****	*****
2001	55	\$34,402	\$34,402
2002	56	115,804	150,206
2003	57	117,703	267,909
2004	58	120,645	388,554
2005	59	51,159	\$439,713
CORRIGAN		\$439,713	

PRESENT VALUE OF FUTURE LVL TO GEORGINE  
2005 - 2029

YEAR	AGE	LVL	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2005	59	\$72,503	1.00000	\$72,503	\$72,503
2006	60	123,662	1.00000	123,662	196,165
2007	61	123,662	1.00000	123,662	319,827
2008	62	123,662	1.00000	123,662	443,489
2009	63	123,662	1.00000	123,662	567,151
2010	64	123,662	1.00000	123,662	690,813
2011	65	123,662	1.00000	123,662	814,475
2012	66	123,662	1.00000	123,662	938,137
2013	67	123,662	1.00000	123,662	1,061,799
2014	68	123,662	1.00000	123,662	1,185,461
2015	69	123,662	1.00000	123,662	1,309,123
2016	70	123,662	1.00000	123,662	1,432,785
2017	71	123,662	1.00000	123,662	1,556,447
2018	72	123,662	1.00000	123,662	1,680,109
2019	73	123,662	1.00000	123,662	1,803,771
2020	74	123,662	1.00000	123,662	1,927,433
2021	75	123,662	1.00000	123,662	2,051,095
2022	76	123,662	1.00000	123,662	2,174,757
2023	77	123,662	1.00000	123,662	2,298,419
2024	78	123,662	1.00000	123,662	2,422,081
2025	79	123,662	1.00000	123,662	2,545,743
2026	80	123,662	1.00000	123,662	2,669,405
2027	81	123,662	1.00000	123,662	2,793,067
2028	82	123,662	1.00000	123,662	2,916,729
2029	83	13,552	1.00000	13,552	\$2,930,281

GEORGINE CORRIGAN

\$2,930,281

Table 24

PRESENT VALUE OF NET LVL TO GEORGINE  
2001 - 2029

YEAR	AGE	LVL	CUMULATE
****	***	*****	*****
2001	55	\$34,402	\$34,402
2002	56	115,804	150,206
2003	57	117,703	267,909
2004	58	120,645	388,554
2005	59	123,662	512,216
2006	60	123,662	635,878
2007	61	123,662	759,540
2008	62	123,662	883,202
2009	63	123,662	1,006,864
2010	64	123,662	1,130,526
2011	65	123,662	1,254,188
2012	66	123,662	1,377,850
2013	67	123,662	1,501,512
2014	68	123,662	1,625,174
2015	69	123,662	1,748,836
2016	70	123,662	1,872,498
2017	71	123,662	1,996,160
2018	72	123,662	2,119,822
2019	73	123,662	2,243,484
2020	74	123,662	2,367,146
2021	75	123,662	2,490,808
2022	76	123,662	2,614,470
2023	77	123,662	2,738,132
2024	78	123,662	2,861,794
2025	79	123,662	2,985,456
2026	80	123,662	3,109,118
2027	81	123,662	3,232,780
2028	82	123,662	3,356,442
2029	83	13,552	\$3,369,994

CORRIGAN \$3,369,994



LOSS OF PAST RELATIONSHIP TO LAURA  
2001 - 2005

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2001	31	\$8,600	\$8,600
2002	32	28,951	37,551
2003	33	29,426	66,977
2004	34	30,161	97,138
2005	35	12,789	\$109,927
BROUGH		\$109,927	

Table 26

PRESENT VALUE OF FUTURE RELATIONSHIP TO LAURA  
2005 - 2052

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2005	35	\$18,126	1.00000	\$18,126	\$18,126
2006	36	30,915	1.00000	30,915	49,041
2007	37	30,915	1.00000	30,915	79,956
2008	38	30,915	1.00000	30,915	110,871
2009	39	30,915	1.00000	30,915	141,786
2010	40	30,915	1.00000	30,915	172,701
2011	41	30,915	1.00000	30,915	203,616
2012	42	30,915	1.00000	30,915	234,531
2013	43	30,915	1.00000	30,915	265,446
2014	44	30,915	1.00000	30,915	296,361
2015	45	30,915	1.00000	30,915	327,276
2016	46	30,915	1.00000	30,915	358,191
2017	47	30,915	1.00000	30,915	389,106
2018	48	30,915	1.00000	30,915	420,021
2019	49	30,915	1.00000	30,915	450,936
2020	50	30,915	1.00000	30,915	481,851
2021	51	30,915	1.00000	30,915	512,766
2022	52	30,915	1.00000	30,915	543,681
2023	53	30,915	1.00000	30,915	574,596
2024	54	30,915	1.00000	30,915	605,511
2025	55	30,915	1.00000	30,915	636,426
2026	56	30,915	1.00000	30,915	667,341
2027	57	30,915	1.00000	30,915	698,256
2028	58	30,915	1.00000	30,915	729,171
2029	59	30,915	1.00000	30,915	760,086
2030	60	30,915	1.00000	30,915	791,001
2031	61	30,915	1.00000	30,915	821,916
2032	62	30,915	1.00000	30,915	852,831
2033	63	30,915	1.00000	30,915	883,746
2034	64	30,915	1.00000	30,915	914,661
2035	65	30,915	1.00000	30,915	945,576
2036	66	30,915	1.00000	30,915	976,491
2037	67	30,915	1.00000	30,915	1,007,406
2038	68	30,915	1.00000	30,915	1,038,321
2039	69	30,915	1.00000	30,915	1,069,236
2040	70	30,915	1.00000	30,915	1,100,151
2041	71	30,915	1.00000	30,915	1,131,066
2042	72	30,915	1.00000	30,915	1,161,981
2043	73	30,915	1.00000	30,915	1,192,896
2044	74	30,915	1.00000	30,915	1,223,811
2045	75	30,915	1.00000	30,915	1,254,726
2046	76	30,915	1.00000	30,915	1,285,641
2047	77	30,915	1.00000	30,915	1,316,556
2048	78	30,915	1.00000	30,915	1,347,471
2049	79	30,915	1.00000	30,915	1,378,386
2050	80	30,915	1.00000	30,915	1,409,301
2051	81	30,915	1.00000	30,915	1,440,216
2052	82	5,251	1.00000	5,251	\$1,445,467

LAURA BROUGH

\$1,445,467

PRESENT VALUE OF NET RELATIONSHIP TO LAURA  
2001 - 2052

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2001	31	\$8,600	\$8,600
2002	32	28,951	37,551
2003	33	29,426	66,977
2004	34	30,161	97,138
2005	35	30,915	128,053
2006	36	30,915	158,968
2007	37	30,915	189,883
2008	38	30,915	220,798
2009	39	30,915	251,713
2010	40	30,915	282,628
2011	41	30,915	313,543
2012	42	30,915	344,458
2013	43	30,915	375,373
2014	44	30,915	406,288
2015	45	30,915	437,203
2016	46	30,915	468,118
2017	47	30,915	499,033
2018	48	30,915	529,948
2019	49	30,915	560,863
2020	50	30,915	591,778
2021	51	30,915	622,693
2022	52	30,915	653,608
2023	53	30,915	684,523
2024	54	30,915	715,438
2025	55	30,915	746,353
2026	56	30,915	777,268
2027	57	30,915	808,183
2028	58	30,915	839,098
2029	59	30,915	870,013
2030	60	30,915	900,928
2031	61	30,915	931,843
2032	62	30,915	962,758
2033	63	30,915	993,673
2034	64	30,915	1,024,588
2035	65	30,915	1,055,503
2036	66	30,915	1,086,418
2037	67	30,915	1,117,333
2038	68	30,915	1,148,248
2039	69	30,915	1,179,163
2040	70	30,915	1,210,078
2041	71	30,915	1,240,993
2042	72	30,915	1,271,908
2043	73	30,915	1,302,823
2044	74	30,915	1,333,738
2045	75	30,915	1,364,653
2046	76	30,915	1,395,568
2047	77	30,915	1,426,483
2048	78	30,915	1,457,398
2049	79	30,915	1,488,313
2050	80	30,915	1,519,228

Table 27 (Cont.)

PRESENT VALUE OF NET RELATIONSHIP TO LAURA  
2001 - 2052

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2051	81	30,915	1,550,143
2052	82	5,251	\$1,555,394

BROUGH	\$1,555,394
--------	-------------

**TAB 2**

# Corporate Financial Group, Ltd.

*Economics / Finance / Litigation Support*

Stan V. Smith, Ph.D.  
President

S T A N     V .     S M I T H ,     P H . D .

## CURRICULUM VITAE

Corporate Financial Group, Ltd. -- Consultants in Economics and Finance. President, 11/85 to present. Clients include many of the nation's largest law firms as well as almost a thousand other prominent law firms in almost every state. Firm provides economic and financial consulting; economic legal analysis for plaintiff and defense counsel in Federal and state courts on lost wages and other monetary losses, business valuation, hedonic damages, product liability, pension fund evaluation and withdrawal liability, security losses, and commercial damages.

-----  
DePaul University. -- Adjunct Professor, College of Law, 1990. Taught a full three credit course in Advanced Remedies - Analysis of Economic Damages in Litigation, and delivered lectures to other courses in subsequent years.

Ibbotson Associates, Inc. -- Economic and Financial Consultants. Managing Director; founder of SBBI Subscription Services, 11/81 to 11/85. Firm provides consulting to hundreds of the nation's most prominent money managers, law firms, brokerage firms, and pension funds.

Sequest International, Inc. -- Founder and President, 7/77 to 11/81. Developed and financed sophisticated research, search, and recovery technologies for ancient underwater artifacts.

The December Group, Ltd. -- Investment Banking Consultants. Associate Economic Analyst 12/74 to 7/77. Firm specialized in mergers and acquisitions, leveraged buy-outs, divestitures and financing specialized start-ups with venture capital.

Bank One - Chicago. -- Staff Economist, 3/74 to 12/74. Analyzed bank credit and service pricing policies.

Federal Reserve System. -- Staff Economist at Board of Governors, Washington, D.C. 9/73 to 2/74.

University of Chicago. -- Lecturer in Public Policy Economics, 3/73 to 6/73. Research Assistant in Economics, 3/70 to 6/73.

Midlothian Manufacturing Co. -- Vice President, 9/68 to 3/73. Responsible for marketing to retail and industrial clients; responsible for production control.

CEG

**EDUCATIONAL BACKGROUND:**

University of Chicago, Chicago IL. Ph.D. in Economics, 1997; Support Areas in Finance and Econometrics. Honors: Allied Chemical Scholar and Federal Reserve Internship.

University of Chicago, Chicago, IL. Master's Degree, 1972, Graduate School of Business; Field of Concentration in Economics.

Cornell University, Ithaca, NY. Bachelor of Science, Operations Research, 1968; Field of Concentration in Statistics, Computer Science and Industrial Engineering, Honors: John McMullen Scholar.

**PROFESSIONAL ACTIVITIES:**

American Arbitration Association, Arbitrator, 1994 to 1996;  
American Board of Disability Analysts, Member & Diplomate, 2001 to present;  
American Board of Disability Analysts, Professional Advisory Council, 2002 to present;

American College of Forensic Examiners, Fellow and Board Certified Forensic Examiner, 1996 to present;

American Economic Association, Member, 1985 to present;

American Finance Association, Member, 1985 to present;

Journal of the American Rehabilitation Economics Association: The Earnings Analyst, Manuscript Referee, 1998 to present;

Journal of Forensic Economics, Board of Editors, 1990 to 2001;

Journal of Forensic Economics, Manuscript Referee, 1990 to present;

National Academy of Economic Arbitrators, Founder and Charter Member, 1989 to present;

National Association of Forensic Economics, Member, 1987 to present;

National Association of Forensic Economics, Vice President, 2000 to 2003;

National Futures Association's Panel of Arbitrators, Arbitrator, 1994 to present;

**PUBLICATIONS:**

Author, "Historical Returns on Investment Instruments," Handbook of Modern Finance 1985, with Roger Ibbotson and Larry Siegel; Dennis Logue, ed., Warren, Gorham & Lamont, New York.

Author, 1988 Supp.to Vol 13, Am Jur Proof of Facts 2d on Hedonic Damages.

Author, "Economist Proposes Relief From Present Value Ruling," Chicago Daily Law Bulletin, June 8, 1988.

Author, "Hedonic Damages" Illinois Tort Report, June, 1988.

Author, "Hedonic Damages in Wrongful Death Cases," the ABA Journal, Sept, 1988.

Author, "Hedonic Damages," The Audio Lawyer, Vol. 6 No. 8, ALI-ABA, February, 1989.

Author, "The Hedonic Value of Life: Economic Expert Witness Testimony in Injury and Wrongful Death," Expert Evidence Reporter, Vol. 1, No. 1, September 1989, Shepard's McGraw-Hill.

Author, "Hedonic Damages in the Courtroom Setting - A Bridge Over Troubled Waters," Journal of Forensic Economics, 3(3), 1990, pp. 41-49, 4419.

CFG

- Co-author, "Hedonic Damages and Personal Injury: A Conceptual Approach," Journal of Forensic Economics, 3(1), 1990, pp. 1-8; Reprinted in A Hedonics Primer for Economists and Attorneys, Compiled and Edited by John O. Ward, Lawyers & Judges Publishing Co., Chapter 7, pp. 121-129, 1992, and in A New Hedonics Primer for Economists and Attorneys, Compiled and Edited by Thomas R. Ireland and John O. Ward, Lawyers & Judges Publishing Co., Reading 25, pp. 325-334, 1996.
- Co-author: Economic/Hedonic Damages: A Practice Book for Plaintiff and Defense Attorneys, with M. L. Brookshire, Anderson Publishing Co., Cinn., Ohio, 1990.
- Co-author: 1991/1992 Cumulative Supplement to Economic/Hedonic Damages: A Practice Book for Plaintiff and Defense Attorneys, with M. L. Brookshire, Anderson Publishing Co., Cinn., Ohio, 1992.
- Co-author: 1992/1993 Cumulative Supplement to Economic/Hedonic Damages: A Practice Book for Plaintiff and Defense Attorneys, with M. L. Brookshire and Charles W. de Seve, Anderson Publishing Co., Cinn., Ohio, 1993.
- Author, "Admissibility of Hedonic Damages Testimony," The Audio Litigator, Vol. 1, No. 1, April, 1990, ALI-ABA, N601.
- Author, "Hedonic Damages in the Courtroom Setting," Journal of Forensic Economics, 3(3), 1990, pp. 41-49; Reprinted in A Hedonics Primer for Economists and Attorneys, Compiled and Edited by John O. Ward, Lawyers & Judges Publishing Co., Chapter 6, pp. 111-120, 1992.
- Author, "Hedonic Damages," with G. Magnarini, Wisconsin Lawyer, Vol. 64, No. 2, February 1991.
- Author, "Hedonic Damages: Assessing the Loss of Enjoyment of Life," California State Bar Bulletin, Vol. 1, No. 8, June 1991.
- Author, "Spotting Bias in Plaintiffs' Economic Loss Reports: A Primer for both Sides," Illinois Bar Journal, Vol 80, No. 12, December, 1992, pp. 635-638.
- Co-Author, 1993 Economic/Hedonic Damages Cumulative Supplement, with M. L. Brookshire and C. W. de Seve, Anderson Publishing Co., Cinn., Ohio.
- Author, "Life Values: Measuring the Loss of Enjoyment of Life - Economic Analysis whose time has come," The Brief, Summer 1993, Vol. 22, No. 4 pp. 24-27, 62-63, The American Bar Association.
- Author, "Evaluating the Loss of Enjoyment of Life - Hedonic Damages," in Charles N. Simkins, ed., Analysis, Understanding and Presentation of Cases Involving Traumatic Brain Injury, National Head Injury Foundation, Wash., DC, 1993.
- Author, "Hedonic Damages in Personal Injury and Wrongful Death Litigation," in Gaughan and Thornton, eds. Litigation Economics, Contemporary Studies in Economic and Financial Analysis, Vol 74, JAI Press, Greenwich, CT, 1993; Reprinted in A New Hedonics Primer for Economists and Attorneys, Compiled and Edited by Thomas R. Ireland and John O. Ward, Lawyers & Judges Publishing Co., Reading 3, pp. 15-36, 1996.
- Author, "Economic Evaluation of the Loss of Enjoyment of Life - Hedonic Damages," in Damages in Tort Actions, Ch. 124, Release 29 - February 1994, Pub. 309, Mathew Bender & Co., New York.
- Author, "Measuring the Loss of Enjoyment of Life in Personal Injury Cases - Hedonic Damages," Journal of the Massachusetts Academy of Trial Attorneys, Vol 2, No. 1, July, 1994, pp. 65-67.
- Author, 3-Part Series, "Two Plus Two Equals -- What?" October, 1994, p. 21; "Detecting Bias in Economics," November, 1994, pp. 14 & 21; "Striving for Economic Fairness," December, 1994, pp. 24-25, California Bar Journal, The Experts.
- Author, "Measuring the Loss of Enjoyment of Life in Personal Injury Cases - Hedonic Damages," MTLA News, Vol. 6, No. 4, December, 1994, pp. 3-5, Maine Trial Lawyers Association.



CEG

- Author, "Hedonic Damages: Measuring The Loss of Enjoyment of Life in Personal Injury Cases," The Prairie Barrister, Vol. 1, No. 1, Winter, 1995, pp. 3, 4, & 12, Nebraska Association of Trial Attorneys.
- Author, "Measuring The Loss of Enjoyment of life in Personal Injury Cases in Ohio - Hedonic Damages," Ohio Trial, Vol. 6, Issue 3, Summer 1995, pp. 13-16, Ohio Academy of Trial Lawyers Education Foundation.
- Author, "Measuring The Loss of Enjoyment of Life in Personal Injury Cases - Hedonic Damages," The Advocate, Vol. 22, No. 5, September/October, 1995, pp. 14-16, 22, The Kentucky Academy of Trial Attorneys.
- Author, "Damages for the Value of Life," North Dakota Trial Lawyers The Pleader, Vol. 18, No. 4, September 1995, pp. 9-11, 24.
- Author, "Hedonic Damages - Measuring The Loss of Enjoyment of Life in Personal Injury Cases," Law Reporter, The Journal of the Hawaii Trial lawyers Association, Vol. 7, No. 9, September 1995, pp. 8-10.
- Author, "Measuring The Loss of Enjoyment of Life in Personal Injury Cases in Arizona - Hedonic Damages," Advocate, Arizona Trial Lawyers Association, November 1995, pp. 5, 7, 15.
- Author, "Hedonic Damages - Measuring the Loss of Enjoyment of Life in P.I. Cases," In Brief, Iowa Trial Lawyers Association, Vol. 7/Issue 1, January-February 1996, pp. 13-15.
- Author, "Measuring the Loss of Enjoyment of Life in Personal Injury Cases and Wrongful Death Cases in New Mexico - Hedonic Damages," The New Mexico Trial Lawyer, New Mexico Trial Lawyers' Foundation, Vol. XXIV, No. 3, March, 1996, pp. 1, 60-63.
- Author with Introduction by Darrel W. Aherin, "Measuring The Loss of Enjoyment of Life in Personal Injury Cases - Hedonic Damages," Idaho Trial Lawyers Association Journal, Volume 25, Number 2, Summer 1996, pp. 32-36.
- Author, "The Value of Life to Close Family Members: Calculating the Loss of Society and Companionship," The New Hedonics Primer for Economists and Attorneys, Second Edition, Edited by Thomas R. Ireland and John O. Ward, Lawyers & Judges Publishing Co., 1996, pp. 377-384.
- Author, "Pseudo-Economists - The New Junk Scientists," Federation of Insurance & Corporate Counsel Quarterly, Vol. 47, No. 1, Fall 1996, pp. 95-105.
- Author with Introduction by Darrel W. Aherin, "Measuring The Loss of Enjoyment of Life in Personal Injury Cases in Idaho - Hedonic Damages," Western Chronicle, N/D 1996, pp. 32, 35-36, Western Trial Lawyers Association.
- Author, "Measuring The Loss of Enjoyment of Life in Personal Injury Cases in Washington - Hedonic Damages," Trial News, Vol. 32, Number 5, January 1997, pp. 29-30, Washington State Trial Lawyers Association.
- Author, "Jury Verdicts in Drunken Driving Cases," University of Chicago Ph.D. Thesis, UMI Dissertation Services, Ann Arbor, MI, 1997.
- Author, "The Value of Life to Close Family Members: Calculating the Loss of Society and Companionship," American Rehabilitation Economics Association 1997 Monograph, pp. 10-16.
- Author, Abstract: "Jury Verdicts in Drunken Driving Cases," Journal of Forensic Economics, 11(1), 1998, p. 67-68.
- Author, "Why Juries Can Be Trusted," Voir Dire, Vol. 5, Issue 3, Summer 1998, pp. 19-21 & 25, American Board of Trial Advocates.
- Author, "Measuring The Loss of Enjoyment of Life in Personal Injury Cases - Hedonic Damages," The Neurolaw Letter, Vol. 9, No. 8, April 2000, pp. 45, 48-49.
- Author, "Jury Verdicts and the Dollar Value of Human Life," Journal of Forensic Economics, 13(2), 2000, pp. 169-188.

CFG

Author, "Hedonic Damages," Izabela Z. Schultz, Douglas O. Brady, Steven Carella, Eds., Psychological Injuries at Trial, Torts Section, American Bar Association, 2003.

Creator, founder and past contributor to Stocks, Bonds, Bills, and Inflation (SBBI) Yearbook, Quarterly, Monthly, and SBBI/PC Services published by Ibbotson Associates. SBBI is the authoritative compendium of U. S. financial and investment performance data from 1926 to the present. SBBI is widely relied upon and regarded as the standard reference in courts of law and by the academic, actuarial and investment community.

#### PROFILES:

The Wall Street Journal December 12, 1988, page 1 feature article;  
The Best Lawyer's in America: Directory of Expert Witnesses 1990, 1992;  
National Law Journal April 17, 1989, page 1 feature article;  
Who's Who in the World 2001  
Who's Who in America 1988-89, 1990-91, 1992-93, 1994, 1995, 1996, 1997, 1998, 1999; 2000; 2001; 2002;  
Who's Who in Finance and Industry 1989-90;  
Who's Who in Science and Engineering 1993, 1995;  
Who's Who in the Midwest 1993;  
Who's Who of Emerging Leaders of America 1989-90, 1991-92, 1993-94;  
Chicago Daily Law Bulletin August 26, 1988, page 1 feature article;  
Chicago Reader Sept 22, 1989 Section 1 feature article;  
Like Judgment Day, The Ruin and Redemption of A Town Called Rosewood, D'Orso, Michael, 1996, Pg. 237.

#### NATIONAL PRESENTATIONS:

American Bar Assn. Annual Meeting in Honolulu, HI, Speaker and Expert Witness at Mock Trial, August, 1989;  
 American Bar Assn. Annual Meeting, San Francisco, CA, August 10, 1992;  
 American Bar Assn., National Institute Transportation Megaconference, New Orleans, LA, March 5, 1993;  
 American Rehabilitation Economics Association Conference, Mock Trial Presided by Nevada Supreme Court Justice William Maupin, Reno, NV, May 15, 1999;  
 Association of Trial Lawyers of America Annual Meeting, Toronto, Economic Damages, 1991;  
 Association of Trial Lawyers of America 1992 Winter Convention, Boca Raton, FL, "Cutting Edge Developments in Economic Testimony," January 15, 1992;  
 Association of Trial Lawyers of America 2001 Winter Convention, New Orleans, LA Litigation at Sunrise, "Measuring the Loss of Enjoyment of Life in Personal Injury Cases -- Hedonic Damages Over the Last Ten Years," February 12, 2001;  
 Brain Injury Association 10th Anniversary Trial Lawyers Conference, Palm Beach, FL, September 19, 1996;  
 Brain Injury Association 13th Annual Conference for Attorneys, Phoenix, AZ, September 16, 1999;  
 Defense Research Institute, Medical Malpractice Seminar, New Orleans, LA, May 6, 1994;  
 Inner Circle of Advocates Annual Meeting, Sun Valley, ID, August, 1989;

CFG

Larry King Live, CNN, May 22, 1989;  
MADD Advanced Victim Assistance Institute Seminar, Dallas, TX, November 12, 1994;  
National Academy of Economic Arbitrators Annual Meeting, Differences in Economic Assumptions in Personal Injury Wage Calculations, Atlanta, GA, December, 1989;  
National Assn. of Consumer Advocates, Building on Our Success, Panel of Experts, "What the Experts Have Learned, A View From the Witness Box, " Orlando, FL, March 9, 2003;  
National Assn. of Forensic Economics Annual Meeting, Value of Life, Atlanta, GA, December, 1989;  
National Assn. of Protection & Advocacy Systems, Inc., 19th Annual Conference, "Assessment and Proof of Damages," Washington, DC, May 30, 1996;  
National Institute for Trial Advocacy (NITA), Seventh Annual Washington DC Masters Advocacy Program, "Direct and Cross Examination of an Economic Witness," October 15, 1991;  
National Norplant Litigation Conference 1995, Houston, TX, June 22, 1995;  
Northwest #255 Air Disaster Steering Committee Mtg, Detroit, MI, June, 1989;  
Swiss Re American Annual Claims Conference, "Looking to the Third Millenium," Hershey, PA, June 3, 1996;  
University of Chicago 1982 Annual Management Conference on Venture Capital;

#### REGIONAL PRESENTATIONS:

Advocacy Institute, Continuing Legal Education, 46th Annual Seminar, "Wrongful Death of an Older Person," Ann Arbor, MI, May 12, 1995;  
American Reinsurance Company for Senior Claims Executives Annual Meeting, August, 1989;  
Anderson Publishing Co., Proof of Economic Damages Seminar, Cincinnati, Ohio, November 2, 1990;  
Eastern Finance Assn. Special Session on Pension Fund Asset Reversions, 1985;  
GSA Seminar "Selling your Business", Chicago, IL, October, 1987;  
Lorman Education Services, "Direct Examination of Experts in a Traumatic Brain Injury Case," Novi, MI, August 21, 1997;  
Lorman Education Services, "Direct Examination of Experts in a Traumatic Brain Injury Case," Livonia, MI, August 26, 1998;  
Southern Trial Lawyers Assn. Annual Meeting, New Orleans, LA, 1988;  
Southern Trial Lawyers Assn. 1996 Mardi Gras Conference, ATLA Traumatic Brain Injury Litigation Group, "Economic Implication of a Closed Head Injury," New Orleans, LA, February 18, 1996;  
Western Trial Lawyers Assn. 1994 Annual Convention, "Making it Work--Trial Practice in the 90's," Maui, HI, June 16, 1994.

#### STATEWIDE PRESENTATIONS:

Arizona State Bar Fourth Annual "CLE By The Sea," San Diego, July 22-23, 1994;  
Arkansas Trial Lawyer Assn. "Maximizing Damages in the Personal Injury Case," Tunica, MS, October 24, 2003;  
Connecticut Trial Lawyer Assn., "All About Experts," November 21, 1992;  
Florida State Bar Assn., National Institute of Trial Advocacy (NITA), Advanced Trial Advocacy Seminar, Speaker and Expert Witness at Mock trial on Economic Damages, May 14, 1991;

CFG

Georgia Brain Injury Association & Institute of Continuing Legal Education in Georgia, "Hedonic Damages: Proving Loss of Enjoyment of Life in Non-Fatal Injury Cases," Atlanta, March 29, 2002;

Idaho Trial Lawyers Assn. Annual Meeting, Twin Falls, February 23, 1996;

Illinois, Insurance Group of the Union League Club of Chicago, "Toward A More Rational Approach to Liability Judgments," March 19, 1991;

Illinois State Bar Assn. CLE Series, April, 1989;

Indiana State Bar Assn. Annual Meeting, October, 1989;

Indiana State Bar Assn. "Masters in Trial" Spring Meeting, South Bend, April 18, 1997;

Indiana Trial Lawyers Assn. Annual Meeting, November 30, 1990;

Iowa Trial Lawyers Assn. Annual Meeting, Des Moines, November 5, 1993;

Kansas Trial Lawyers Assn. Annual Meeting, December 8, 1990;

Kentucky Academy of Trial Attorneys Damages Seminar, Louisville, KY, August 18, 1995;

Louisiana Trial Lawyer Assn., Baton Rouge, LA, "Winning with Experts" Seminar, November 10, 1989;

Louisiana Trial Lawyer Assn., New Orleans, LA, "Winning With the Masters" Seminar, November 21, 1995;

Louisiana Trial Lawyer Assn., New Orleans, LA, "Winning With the Masters" Seminar, December 10, 1997;

Massachusetts Trial Lawyers Assn., "Learn From the Experts," October 9, 1992;

Massachusetts Trial Lawyers Assn. Annual Mtg, Boston, October 29, 1993.

Michigan Trial Lawyers Assn. Annual Mtg, Wrongful Death Damages, May, 1990;

Michigan Trial Lawyers Assn. Winter Seminar, Gaylord, "Hedonic Damages and Other Special Economic Issues," February 24, 2001;

Michigan Trial Lawyers Assn. 13th Annual Seminar in the Snow, Litigation Strategies and Techniques, Bellaire, "Loss of Society and Household Companionship and Advisory Services," February 22, 2003;

Michigan Head Injury Alliance Fifth Annual Seminar on Closed Head Injury, Detroit, March 24, 1994;

Michigan Head Injury Alliance Sixth Annual Seminar on Closed Head Injury, Detroit, March 23, 1995;

Michigan Head Injury Alliance Seventh Annual Seminar on Closed Head Injury, Detroit, March 28, 1996;

Michigan Head Injury Alliance Eighth Annual Seminar on Closed Head Injury, Detroit, March 27, 1997;

Michigan, Institute of Continuing Legal Education, Troy, MI, "The Name of the Game is Damages--Plaintiff and Defense Strategies in Negligence and Employment Cases," July 20, 2000;

Mississippi Trial Lawyers Assn. Annual Convention, "Shooting Stars Seminar," Biloxi, May 19, 1995;

Mississippi Trial Lawyers Assn. Annual Convention, "Taking Your Recovery to the Next Level: Hedonic Damages, Biloxi, May 10, 2001;

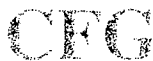
Missouri State Bar Annual Meeting, Kansas City, September 19, 1996;

Missouri State Bar CLE Seminar, Proving Damages in Catastrophic Injury Cases, "Hedonic Damages after September 11th and An Economist's View on Proving Economic Damages," Kansas City, April 19, 2002;

Missouri State Bar CLE Seminar, Proving Damages in Catastrophic Injury Cases, "Hedonic Damages after September 11th and An Economist's View on Proving Economic Damages," St. Louis, May 9, 2002;

Montana Trial Lawyer Association Fourth Annual Convention, "Proving The Intangible (Hedonic) Value of Human Life," Whitefish, July 23, 1993;

Montana Trial Lawyer Association Seventh Annual Convention, Seminar of the Masters, Polson, August 1, 1996;



Montana Trial Lawyer Association Spring Seminar, Scientific Evidence, "Making Tangible the Intangible: Loss of Enjoyment of Life, and Society & Companionship Damages," Billings, April 25, 2003;

Nevada, Required Medical and Legal Education for the Traumatic Brain Injury Case, "9/11 Victim Compensation Fund Hedonic Damages: Implications for the State of Nevada," Las Vegas, October 25, 2002;

New Hampshire Trial Lawyer Association, "Secrets & Strategies of Trial Law," Concord, October 8, 1993;

New Mexico Trial Lawyers Association Annual Meeting, Economic Damages, June 22, 1991;

New Mexico Trial Lawyers Foundation Damages Seminar, Albuquerque, October 11, 1996;

North Carolina, Brain Injury Assn. of NC, First Annual Trial Lawyers Conference, "The Use of Expert Testimony in Brain Injury Litigation," Charlotte, January 26, 1996;

North Carolina, Brain Injury Assn. of NC, Second Annual Trial Lawyers Conference, "The Loss of Enjoyment of Life in Personal Injury - Hedonic Damages," Charlotte, January 24, 1997;

North Dakota Trial Lawyers Assn, Annual Meeting Trial Practice Seminar, Fargo, May 4, 1995.

Ohio Assn. of Trial Lawyers Annual Meeting, Speaker and Expert Witness at Mock Trial on Wrongful Death Damages, April, 1990;

Ohio Head Injury Association, "Representing the Survivor of Mild Head Injury," Annual Seminar, Columbus, June 3, 1994;

Pennsylvania, Philadelphia Trial Lawyers Association CLE Lecture Series, March 17, 1993;

South Dakota Trial Lawyers Assn. Spring Seminar, April, 1989;

Texas Trial Lawyers Assn., Medical Malpractice Seminar, Wrongful Death Damages, May, 1990;

Washington State Trial Lawyers Annual Meeting & Convention, Stevenson, July 11, 1998;

Wisconsin Assn. of Trial Lawyers Annual Mtg, Wrongful Death Damages, July, 1990.

Wisconsin Brain Injury 2nd Annual Seminar, "Identifying and Understanding Traumatic Brain Injury," Green Lake, May 31, 1997;

#### LOCAL PRESENTATIONS:

American Radio Network, WFOX, Detroit, MI, January, 1989;

Anchorage, Alaska, Trial Lawyers Assn., August, 1989;

Cassiday Schade & Gloor, "Catastrophic Damages...They're Back! - Limiting Damages After the Invalidiation of Tort Reform," Chicago, November 18, 1998;

Chicago Advocates Society, June, 1988;

Chicago Bar Assn. Effective Direct and Cross-Examination of Expert Witnesses - A Demonstration, January 9, 1995;

Chicago Bar Assn. Torts Seminar, Defense Perspectives on Economic Damages, January 21, 1991;

Chicago Bar Assn. Wrongful Death Seminar, Wrongful Death Damages, February, 1990;

Chicago Bar Assn., Wrongful Death Seminar, February 11, 1993;

Chicago North Suburban Bar Assn. May, 1988;

Chicago Public Radio, WBEZ, February, 1989;

DuPage County, Illinois (Chicago) Bar Assn., May, 1989;

Hamilton County, Ohio, (Cincinnati) Bar Assn. Seminar on Economic Damages, January 31, 1991;

## CEG

Interstate National Corporation, Illinois, (Chicago), "Cutting Edge Developments on Economic Damages - Defense Perspectives", August 2, 1995;  
Interstate National Corporation, Illinois, (Chicago), "Cutting Edge Developments on Economic Damages - Defense Perspectives", September 2, 1997;  
Law Bulletin Publishing Company, Legal Career Day, Economic Outlook for Lawyer Employment, April 13, 2004;  
McHenry County, Illinois (Chicago) Bar Assn., May, 1989;  
Northwest Chicago Suburban Bar Assn., January, 1989;  
Oakland County Bar Association Negligence Committee, Bloomfield Hills, MI, November 5, 1996;  
Sangamon County, Illinois (Springfield) Trial Lawyers Assn., May, 1989.

### VIDEO PRESENTATIONS

American Bar Association Tort and Insurance Practice Section Annual Meeting, "Hedonic Damages," San Francisco, August 10, 1992.  
American Law Institute-American Bar Association, ALI-ABA Tape, "Hedonic Damages: Litigating the Loss of Enjoyment of Life," The Lawyers' Video Magazine, Vol. III Issue 20, December, 1991.

### PERSONAL BACKGROUND:

Born November 16, 1946, Rhinelander, Wisconsin;  
Graduated Nicolet High School 1964, Milwaukee, Wisconsin;  
Honorable Discharge U.S. Army, 1975;  
Co-Founder, Men's Guild, Chicago, Illinois, 1991.